# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:  ION GEOPHYSICAL CORPORATION,  Debtors  \$	Case No. 22-30987 (MI) Chapter 11
WITNESSES: §	Judge: Marvin Isgur
Coy Holdon Sims (fact witness)	Courtroom Deputy: Tyler Laws
Cynthia Moulton (fact witness & legal expert) §	Hearing Date: May 9, 2022; 3:30 p.m.
Kenneth Thomas (fact witness & legal expert)§	Party Name: Cobra Acquisition Servs, SA
Any witness called by other parties-in-interest§	Attorney Names: Tom Kirkendall
\$	Attorney Phone: 713.703.3536
\$	Nature of Proceeding: Hearing on Debtors'
\$	First Omnibus Motion for Rejection of
\$	Exectory Contracts and Related Relief
Š	(Dkt 25)

## WITNESS AND EXHIBIT LIST OF COBRA ACQUISITION SERVICES, S.A.

Cobra may call the following witnesses:

- 1. Marcus Pullicino, CEO of Cobra Acquisition Services, S.A.
- 2. Any witness called or designated by any other party-in-interest; and
- 3. Any witness called to rebut the testimony of witnesses called or designated by any other party-in-interest.

Ex#	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Master Geophysical Service Agreement dated as of July 22, 2011 (the "Master Services Agreement")				

Ex#	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
2	Supplemental Agreement No. 6 to Master Geophysical Services Agreement No. 1195				
3	Supplemental Agreement No. 13 to Master Geophysical Services Agreement				
4	Acknowledgement Letter Re: Scrivener's Error				
5	Cobra's First Notice of Default and Reservation of Rights, Oct. 25, 2021				
6	Exhibit 6 - Cobra's Second Notice of Default and Retainment of Work Product, January 14, 2022				

Cobra reserves the right to call or to introduce any of none of the witnesses or exhibits listed above, and further reserves the right to supplement or amend this list at any time prior to the final hearing in this contested matter.

Cobra's Witness and Exhibit List Page 2

#### Respectfully submitted:

/s/Tom Kirkendall

Tom Kirkendall
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ATTORNEY FOR COBRA ACQUISITION SERVICES, S.A.

#### **OF COUNSEL:**

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Pro hac vice motion pending
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument, was served via
electronic transmission to counsel for the debtor, U.S. Trustee, creditors and parties-in-interest
via the Court's ECF system on the 5 <sup>th</sup> day of May, 2022.

/s/ Tom Kirkendall
Tom Kirkendall

Cobra's Witness and Exhibit List

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